

**U.S. Department of Energy
Materials Management
U.S. Environmental Protection Agency—Resource Conservation and Recovery Act**

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Line of Inquiry and source		Compliance				
		No	Yes	N/A	Findings/observation	Comments
1.0	Investigate The Range of Materials That The Scrap Metal Recycling Facility Accepts.					
1.1	Determine whether the facility accepts “scrap metal” only or whether it also accepts additional metal materials for recycling.					
1.2	Determine whether the facility accepts metals which do not qualify as scrap metals.					
1.3	Investigate the facility’s incoming waste stream, and interview facility managers to determine their process for screening incoming materials.					
1.4	Determine methods that the facility uses to screen for radioactively contaminated scrap metal.					
1.5	Conclude whether facility only accepts scrap metal, or whether it also accepts materials that would trigger RCRA.					
2.0	If The Facility Does Not Limit The Materials It Accepts To Scrap Metal, Investigate Pre-Recycling Storage of Recyclable Materials.					
2.1	Determine whether the facility stores materials on-site prior to recycling.					

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3.0	If Pre-Recycling Storage Occurs, Investigate Facility For Compliance With Treatment, Storage, and Disposal (TSD) Requirements.					
3.1	Determine whether the facility possesses a RCRA permit.					
3.2	EPA identification number & required notices. 40 CFR 264.11 & 264.12.					
3.3	Inspect incoming waste analysis methods. 40 CFR 264.13.					
3.4	Investigate site security. 40 CFR 264.15.					
3.5	Investigate facility's methods of conducting self inspections					
3.6	Review personnel training accomplishments. 40 CFR 264.17.					
3.7	Review procedures for special handling of hazardous wastes.					
3.8	Consult location standards for TSD facilities. 40 CFR 264.18.					
3.9	Review preparedness & prevention precautions. 40 CFR 264.30 - 37.					

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3.10	Review contingency plan & emergency procedures.					
3.11	Review the facility's compliance with the manifest system, record keeping & reporting					
4.0	The Recycling Process					
4.1	Determine if the recycling process is part of a larger hazardous waste treatment operation					
5.0	Generation of Hazardous Waste Residuals					
5.1	Identify whether the facility qualifies as a conditionally exempt small quantity generator (CESQG).					
5.2	Identify whether the facility qualifies as a small quantity generator (SQG)					
5.3	Identify whether the facility qualifies as a large quantity generator (LQG).					
5.4	Inspect the facility's methods to identify hazardous waste that it may produce. 40 CFR 262.11.					

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5.5	Review the facility's procedures for notification of hazardous waste management activities.					
5.6	Determine whether the facility possesses an EPA identification number as a waste generator.					
5.7	Review the facility's procedures for complying with manifest requirements.					
5.8	Inspect pre-shipment storage of generated waste. 40 CFR 262.34.					
5.9	Inspect satellite accumulation of hazardous waste. 40 CFR 265.171-173.					
5.10	Review packaging and labeling procedures. 40 CFR 262.30.					
5.11	Review marking procedures. 40 CFR 262.32.					
5.12	Placarding					
5.13	Inspect record keeping procedures.					
5.14	Inspect biennial reports.					
5.15	Inspect exception reports.					

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